REMARKS

Applicants thank the Examiner for total consideration given the present application. Claims 1-13 are currently pending in the present application. Claims 1 and 13 are independent. No claims have been canceled and no new claims have been added. Applicants respectfully request reconsideration of the rejected claims in light of the remarks presented herein, and earnestly seek timely allowance of all pending claims.

I. Interview Summary

Applicants thank the Examiner for granting a telephone interview with the Applicants' representative on July 21, 2008. Applicants appreciate for the clarification that the "Ito" reference mentioned in page 15, line 5 of the final Office Action is a typographical error. Applicants further thank the Examiner for sending a corrected final Office Action via facsimile.

II. Claim Rejections Under 35 U.S.C. § 102(e)

Claims 1, 2, 6 and 8-11 stand finally rejected under 35 U.S.C. § 102(e) as being anticipated by Watanabe et al. (U.S. 6,877,031 B2). These rejections are respectfully traversed.

For a Section 102 rejection to be proper, the cited reference must teach or suggest each and every claimed element. *See M.P.E.P. 2131; M.P.E.P. 706.02.* Thus, if the cited reference fails to teach or suggest one or more elements, then the rejection is improper and must be withdrawn.

In this instance, Watanabe fails to teach or suggest each and every claimed element. For example, independent claim 1 recites, *inter alia*,

> ***a code conversion means*** for ***converting the ID and the password into a code*** storing information on the ID and the password;
>
> ***a code transmission means*** for ***transmitting the obtained code*** to the address inputted by the destination input means; and
>
> ***an image data returning means*** for, when the print terminal ***decodes the code to the ID and the password*** and ***transmits the ID and the password***, performing authentication using the ID and the password and, if a positive authentication result is obtained, reading the image data corresponding to the ID from the image data accumulation means and returning the read image data to the print terminal. (*Emphasis added.)*

It is respectfully submitted that Watanabe fails to teach or suggest the above-identified claim features of independent claim 1.

As previously submitted, Watanabe merely discloses a network photograph system that stores images and allows a user 1 to select a number of images from the stored images to be distributed to a number of users. User 1 may register with the site, obtaining a user ID and password, and will be allowed access to upload images to view and distribute images corresponding to their user ID and password. Images can be electronically mailed to a destination address wherein a thumbnail size picture is enclosed or a clickable URL is included in the mail. If the receiver of the electronic mail wishes to purchase any of the images they may do so by first registering with the site and obtaining a user ID and password. Then the receiving user may select any of the images registered with their account and have them sent to a laboratory for printing.

The present invention teaches a printing service system and a printing service program in which a user who is unaccustomed to machine operations may print an image with ease (page 2, line 22). The printing service system includes ***a code conversion means*** for ***converting the ID and the password into a code*** storing information on the ID and the password and a ***code transmission means*** for ***transmitting the obtained code*** to the address by the destination input means (page 3, line 21 – page 4, line 15). Further when the print terminal decodes the code to the ID and the password and transmits the ID and password, performing authentication using the ID and the password, if a positive result is obtained the image data is read corresponding to the ID from the image data accumulation means and returns the image data to the prints terminal so that the user can print the image (page 3, line 21 – page 4, line 15). Under this structure, the user never has to remember their ID and password, they can simply use an encrypted code that is generated by the printing service system (page 4, lines 9- 15).

Watanabe is distinguished from the claimed invention in that no where does Watanabe teach or suggest a code conversion means, a code transmission means, and a print terminal or an image data returning means that decodes the encrypted code as recited in claim 1.

Watanabe discloses that when user 1 wants to access the network photograph system for viewing and uploading stored images, a WWW application server 15 requests the user 1 to input a user ID and a user password. Then, the provided user ID and password are compared with already registered user ID and password stored in a ***user information database*** for verification. (*Col. 7, lines 28-32.*)

The Examiner relies on the "***information database***" as disclosing the claimed "***code conversion means***" for converting the user ID and the password into a code storing information on the ID and the password. The Examiner states, "ID and password, which is associated with various kinds of information, ***is understood as code of a computer*** which is stored in a database and storage." (*See page 3, last paragraph and page 13, last paragraph of the final Office Action.*) It is respectfully submitted that the Examiner is misinterpretation the "information database" of Watanabe. The information database of Watanabe simply ***stores*** the ID and password of user 1 for later comparison with the same ID and password provided by user 1. ***Nowhere does Watanabe teach or suggest that the information database coverts the ID and password of user 1 into a code***. *Emphasis added.*

As demonstrated above, the user of the claimed invention never has to remember their ID and password, he/she can simply use an encrypted code that is generated by the printing service system. Conversely, user 1 of Watanabe always has to provide the exact ID and password that is already stored in the information database. For example, if user 1 of Watanabe provides ***a code***, instead of the actual ID and password, as input data requested by the WWW application server 15, user 1 will never be allowed to access the network photograph system since the ***WWW application server 15 could not compare the code with the stored ID and password of user 1***. As demonstrated above, the WWW application server 15 only compares the provided ID and password of user 1 with the stored ID and password of user 1 from the information database. If the ID and password of user 1 is converted into a code, the information database will not recognize such code with the stored ID and password. Thus, user 1 of Watanabe will be dined any access to the network photograph system.

The Examiner's mere allegation that ID and password associated with various kinds of information can be understood as code of a computer is totally erroneous. Even if, *assuming arguendo*, the ID and password is understood as a code of a computer, as demonstrated above in great detail, the ***WWW application server 15 could not compare such computer code with the stored ID and password of user 1***.

Therefore, for at least these reasons, it is respectfully submitted that Watanabe fails to teach "a code conversion means for converting the ID and the password into a code storing information on the ID and the password as recited in claim 1. In addition, since Watanabe fails to teach "a code conversion means", it is submitted that Watanabe ***cannot*** teach "a code transmission means for transmitting the obtained code to the address inputted by the destination input means as recited in claim 1. At best, Watanabe may only teach "an ID and password transmission means", ***not*** a code transmission means, for comparing stored ID and password of a user. Further, Watanabe fails to teach "an image data returning means for, when the print terminal decodes the code to the ID and the password and transmits the ID and the password, performing authentication using the ID and the password and, if a positive authentication result is obtained, reading the image data corresponding to the ID from the image data accumulation means and returning the read image data to the print terminal" as recited in claim 1. Neither the WWW application server 15 nor the information server database can be properly interpreted as a ***decoder*** for decoding an encoded ID and password. As demonstrated above, if the ID and password of user 1 is transmitted as a code, neither of the WWW application server 15 and the information database would recognize such code. Accordingly, user 1 would be denied access to the network photograph system.

Accordingly, Applicants respectfully assert that Watanabe fails to anticipate Applicants' claimed invention for at least the reasons set forth above with regards to independent claim 1.

Applicants submit that claims 2, 6 and 8-11 are allowable at least by virtue of their dependency either directly or indirectly on claim 1.

Accordingly, reconsideration and withdrawal of this anticipation rejection is respectfully requested.

III. Claim Rejections Under 35 U.S.C. § 103(a)

A. The Examiner has rejected claims 3, 5, 7, 12, and 13 under 35 U.S.C. § 103(a) as being unpatentable over Watanabe et al. (U.S. 7,228,339 B2) further in view of Yamamoto et al. (U.S. 7,228,339 B2). These rejections are respectfully traversed.

For a Section 103 rejection to be proper, a *prima facie* case of obviousness must be established. *See M.P.E.P. 2142.* One requirement to establish *prima facie* case of obviousness is that the prior art references, when combined, must teach or suggest all claim limitations. *See M.P.E.P. 2142; M.P.E.P. 706.02(j).* Thus, if the cited references fail to teach or suggest one or more elements, then the rejection is improper and must be withdrawn.

Regarding dependent claims 3, 5, 7, and 12, Yamamoto does not remedy the noted deficiencies of Watanabe. Yamamoto is only relied upon to teach dependent claim features. This reliance on Yamamoto fails to make up for the deficiencies of Watanabe discussed above with respect to claim 1. Therefore, the asserted combination of Watanabe and Yamamoto (assuming these references may be combined, which Applicants do not admit) fails to establish a prima facie case of obviousness of any pending claim.

Therefore, for at least the reasons raised above with regards to Watanabe under §102, the combination of Watanabe in view of Yamamoto under §103, fails to cure the deficiencies of Watanabe under §102, and fails to render the claimed invention obvious. Applicants submit that claims 3, 5, 7, 12 are allowable at least by virtue of their dependency on claim 1. Accordingly, reconsideration and withdrawal of this rejection is respectfully requested.

With regards to claim 13, The Examiner relies on Watanabe as disclosing:

> "***converting*** by the server ***the ID and the password into a code*** having an information on the ID and the password;
> ***transmitting the code*** by the server to the address inputted in the address input step;
> ***decoding*** by the print terminal ***the code*** so as to return it into the ID and the password and transmit the ID and the password to the server" (*Emphasis added*).

As above, and for the specific reason raised against claim 13, Watanabe fails to render claim 13 obvious under § 103(a) for at least the same reasons as applied above under §102.

In an attempt to provide what is lacking in Watanabe, the Examiner has applied Yamamoto. As understood, Yamamoto discusses a storage output system wherein the user inputs a password and ID to obtain stored information. (Figure 1) With most passwords and IDs sent over the internet it is desirable to use an encryption method such as SSL as taught in Yamamoto. Yamamoto fails to at least disclose forming a code from a password and ID. In fact, as shown in Figure 1, the user must still enter their password and ID. Encryption as described in Yamamoto is only used to prevent hackers or others on the internet from receiving this private information.

Watanabe in view of Yamamoto does not teach, disclose, or suggest "converting by the server the ID and the password into a code having information on the ID and the password." In addition Watanabe in view of Yamamoto does not teach, disclose, or suggest "transmitting the code by the server to the address inputted in the address input step." Further, Watanabe in view of Yamamoto does not teach, disclose, or suggest "decoding by the print terminal the code so as to return it into the ID and the password and transmit the ID and the password to the server." Also, Watanabe fails to teach, disclose or suggest "performing authentication by the server using the ID and the password obtained through decoding." This reliance on Yamamoto fails to make up for the deficiencies of Watanabe discussed above with respect to claim 13. Therefore, the asserted combination of Watanabe and Yamamoto (assuming these references may be combined, which Applicants do not admit) fails to establish prima facie case of obviousness of any pending claim.

Applicants submit that claim 13 is allowable and accordingly, reconsideration and withdrawal of this rejection is respectfully requested.

B. The Examiner has finally rejected claim 4 under 35 U.S.C. § 103(a) as being unpatentable over Watanabe et al. (U.S. 7,228,339 B2) further in view of Banerjee et al. (U.S. 6,748,296 B2). These rejections are respectfully traversed.

Banerjee does not remedy the noted deficiencies of Watanabe. Banerjee is only relied upon to teach dependent claim features. This reliance on Banerjee fails to make up for the deficiencies of Watanabe for at least the reasons discussed above with respect to claim 1 under §102. Therefore, the asserted combination of Watanabe and Banerjee (assuming these references

may be combined, which Applicants do not admit) fails to establish prima facie obviousness of any pending claim under §103.

Applicants submit that claim 4 is allowable at least by virtue of its dependency on claim 1. Accordingly, reconsideration and withdrawal of this rejection is respectfully requested.

In view of the above amendment, Applicants believe the pending application is in condition for allowance.

CONCLUSION

Should there be any outstanding matters that need to be resolved in the present application, the Examiner is respectfully requested to contact Ali M. Imam Reg. No. 58,755 at the telephone number of the undersigned below, to conduct an interview in an effort to expedite prosecution in connection with the present application.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37.C.F.R. §§1.16 or 1.147; particularly, extension of time fees.

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Respectfully submitted,

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